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**Hearing Date: June 21, 2011**

William M. Braman  
(Admitted *Pro Hac Vice*)

Attorneys for Universal Tool and Engineering Company, Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

DPH HOLDINGS CORP., *et al.*,

Case No. 05-44481 (RDD)

Reorganized Debtors.

(Jointly Administered)

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DELPHI AUTOMOTIVE SYSTEMS, LLC,

Plaintiff

- against -

Adversary Proceeding No. 07-02505-rdd

UNIVERSAL TOOL & ENGINEERING COMPANY, INC.,

Defendant

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**SUR-REPLY AND JOINDER OF UNIVERSAL TOOL & ENGINEERING COMPANY, INC.**  
**IN SUPPORT OF OBJECTIONS TO THE REORGANIZED DEBTORS'**  
**MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Defendant, Universal Tool & Engineering Company, Inc., an Indiana corporation (“Universal Tool”), hereby submits this Sur-Reply in support of its objection (the “Objection”) to the Reorganized Debtors’ Motion for Leave to File Amended Complaints (the “Motion”).

In the interest of judicial economy, Universal Tool will not repeat and restate the arguments advanced by similarly situated parties who have filed Sur-Replies to the Motion. Universal Tool joins and adopts all relevant arguments and authorities, as if fully stated herein, set forth in Johnson Controls, Johnson Controls Battery Group, and Johnson Controls, Inc.’s Sur-

Reply (Main Case No. 05-44481, Docket No. 21312), Methode Electronics, Inc.'s Sur-Reply (Main Case No. 05-44481, Docket No. 21319) and Ex-Cell-O Machine Tools, Inc.'s Sur-Reply (Main Case No. 05-44481, Docket No. 21321), as well as in all other objections filed by similarly situated defendants as if they were set forth herein in their entirety. Universal Tool reserves the right to supplement this Sur-Reply, including but not limited to providing documentary evidence, and to appear at any and all hearings and conferences scheduled on the Motion.

Respectfully submitted,

/s/ William M. Braman  
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CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of June, 2011, a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/ William M. Braman  
William M. Braman